


Application **DENIED** without prejudice to renewal as follows: By **November 1, 2024**, Defendants shall refile any motion to seal contents that Defendants seek to maintain under seal. Defendants shall also file under seal an unredacted version, with the redacted portions highlighted. Defendants shall support each request to redact or maintain under seal with the basis for the request. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). The parties' confidentiality designations and the terms of the protective order are not dispositive of whether the public's right of access to judicial documents overcomes competing considerations. The document filed at Dkt. No. 117 shall remain under seal in the meantime.

Dated: October 28, 2024

New York, New York

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Re: *In re Waste Management Securities Litigation*, No. 1:22-cv-04838-LGS (S.D.N.Y.)

Dear Judge Schofield:

In accordance with Rule I.D.3 of Your Honor's Individual Rules and Procedures for Civil Cases and the Confidentiality Agreement and Stipulated Protective Order (ECF No. 69), Lead Plaintiffs respectfully request leave to file a redacted version of Lead Plaintiffs' accompanying letter requesting a pre-motion conference. Lead Plaintiffs seek the Court's permission to file this material with redactions based on Defendants' confidentiality designations regarding materials cited in the letter.

Respectfully submitted,

*/s/ Noam Mandel*

Noam Mandel

cc: All Counsel of Record (via ECF)

# Robbins Geller Rudman & Dowd LLP

Chicago Melville Nashville San Diego Wilmington  
Boca Raton Manhattan Philadelphia San Francisco Washington, D.C.

## APPENDIX

### Parties:

1. Seafarers Officers & Employees Pension Plan
2. Seafarers Money Purchase Pension Plan
3. United Industrial Workers Pension Plan
4. Waste Management, Inc.
5. James C. Fish, Jr.
6. John J. Morris
7. Devina A. Rankin

### Attorneys:

1. Noam Mandel
2. Chad Johnson
3. Desiree Cummings
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6. Amy Hefley
7. Jessica B. Pulliam
8. David D. Sterling
9. James J. Beha II
10. Brendan Quigley
11. John B. Strasburger